

F I L E D
Clerk
District Court

DEC - 7 2007

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For The Northern Mariana Islands
By _____
(Deputy Clerk)

7 Attorneys for United States of America

8 UNITED STATES DISTRICT COURT

9 NORTHERN MARIANA ISLANDS

10 UNITED STATES OF AMERICA,) Criminal Case No. 07 - 00028
11 Plaintiff,)
12 v.)
13 REYES, ROSE MAYO,)
14 Defendant.)
15 _____

COMPLAINT

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18 THE UNDERSIGNED COMPLAINANT CHARGES UPON INFORMATION AND BELIEF
THAT:

19 COUNT ONE

20 (FALSE STATEMENT IN APPLICATION AND USE OF A PASSPORT)

21 On or about August 23, 2007, in the District of the Commonwealth of the Northern Mariana
22 Islands, REYES, ROSE MAYO, the defendant, did knowingly and intentionally make a false
23 statement in an application for a passport with the intent to induce or secure the issuance of a
24 passport under the authority of the United States.

25 (Title 18, United States Code, Section 1542).
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1 COMPLAINANT FURTHER STATES:

2 1. On November 01, 2007, due to a sudden influx of U.S. passport applications executed by
3 Saipan-born females claiming marriage to Bangladeshi males, the Diplomatic Security Service
4 ("DSS") initiated an investigation in Saipan to determine the veracity of these marriage claims.

5 2. Your affiant reviewed one such application and learned that on October 17, 2007, an
6 individual identified as Rosa Mayo REYES ("REYES") executed an Application for a U.S. Passport
7 ("DS-11") at the U.S. Passport Office located in Saipan. In Box #19 of the DS-11, REYES stated
8 that on May 09, 2007, she married an individual identified as Mohamad Ruhul AMIN ("AMIN"),
9 born October 20, 1976 in Bangladesh.

10 3. On December 02, 2007, REYES was interviewed by your affiant in Garapan, Saipan to
11 discuss among other things, the veracity of her claim of being married to AMIN, as stated in the DS-
12 11 in question.

13 4. REYES stated that she was approached by AMIN sometime in 2007 with an offer of
14 marriage. REYES stated that the purpose of the marriage to AMIN was based on the following
15 factors: To allow AMIN to be gainfully employed and remain in Saipan as the spouse of a U.S.
16 citizen born in Saipan, and for REYES to receive \$400 cash and other material items such as food,
17 clothes and a cellular telephone.

18 5. REYES stated that she is currently in a relationship with a Saipan-born male and that she
19 has two children from this person. REYES resides with her family in Tanapag, while AMIN resides
20 in Garapan. REYES further stated that when she married AMIN, she married him strictly for
21 financial gain on her part, and for AMIN to receive an Immediate Relative permit that would allow
22 AMIN to be gainfully employed and remain in Saipan as the spouse of a U.S. citizen born in Saipan.

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2 6. On October 17, 2007, REYES executed the DS-11 in question and stated in Box #19 that
3 she was married to AMIN when in fact, REYES married AMIN solely for financial gain and for
4 AMIN to circumvent U.S. immigration laws.

Lando Sales, Special Agent
Diplomatic Security Service

SUBSCRIBED and SWORN to before me
this 6th day of December 2007.

16 Alex R. Munson
17 ALEX R. MUNSON
UNITED STATES DISTRICT JUDGE